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Exhibit A

[PROPOSED] Order

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13 **UNITED STATES BANKRUPTCY COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

15 **In re:**

16 **PG&E CORPORATION**

17 **-and-**

18 **PACIFIC GAS AND ELECTRIC**
COMPANY,

19 **Debtors.**

20 Affects PG&E Corporation
21 Affects Pacific Gas and Electric Company
22 Affects both Debtors

23 *All papers shall be filed in the Lead Case,
24 No. 19-30088 (DM)

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

25 **ORDER GRANTING THE OFFICIAL**
COMMITTEE OF TORT CLAIMANTS'
MOTION TO ESTABLISH
PROCEDURES FOR DISCOVERY
PRECEDING PLAN CONFIRMATION

1 This matter having come before the Court on the Official Committee of Tort Claimants'
2 ("TCC") Motion to Establish Procedures for Discovery Preceding Plan Confirmation and this
3 Court having reviewed the submissions from counsel, and for good cause shown, the Court
4 hereby **GRANTS** the TCC's Motion.

5 **IT IS HEREBY ORDERED THAT:**

6 1. The TCC's Motion is **GRANTED**. The Court hereby **ENTERS** the following
7 procedures for resolving disputes in connection with the TCC's pending and future discovery
8 preceding Plan Confirmation:

- 9 • Retired Judge Newsome shall be appointed as a Special Master to resolve any
10 disputes that require court intervention, if a consensual resolution cannot be
11 reached, despite the good faith efforts of the parties.
- 12 • Each vendor who wishes to object to the TCC's subpoena or other discovery
13 requests ("Objecting Party") must participate in a meet-and-confer discussion over
14 the phone with TCC counsel before deeming that an objection cannot be resolved
15 without Court intervention. Emails and voicemails will not satisfy this request. No
16 filings shall be accepted without satisfying this meet-and-confer requirement.
- 17 • The Objecting Party and the TCC must work in good faith to resolve the objection
18 without intervention by the Special Master.
- 19 • If, after working in good faith to resolve the objection, the parties reach an impasse
20 and determine that intervention of the Special Master is necessary, the following
21 procedures must be followed:
 - 22 ◦ The Objecting Party sends a brief list of its objections to the TCC, tied to
23 specific production requests, as well as a statement under oath that the parties
24 have met and conferred in good faith, pursuant to the directives in this Order.
 - 25 □ For each objection, the Objecting Party may only include in the list
26 a sentence or two briefly stating the basis for the objection.
 - 27 □ No extensive argument or case law may be included, nor any history
28 of exchanges of emails, letters, etc.

- Within 7 days, the TCC will send the Objecting party its responses to the objections, also in list form, that includes only a sentence or two briefly stating the basis for overruling the objection.
- Once the Objecting Party sends the list to the TCC, each Objecting Party’s duty to produce the documents subject to the objection is paused, until the objections are resolved by the Special Master.
- The TCC will aggregate objections from all Objecting Parties that are pending at that time, and the TCC’s responses to same, into one list for submission to the Special Master. Once the TCC determines it has received the objections pertaining to pending disputes, the TCC will file the list with the Special Master and serve the list on all Objecting parties. No briefing shall be included in the filing; the TCC shall only file a Notice of Objections and the List of Objections.
- The TCC will group like objections into similar categories wherever possible.
- The Special Master will set a telephonic hearing to resolve the list of objections and hear brief factual argument from Objecting Parties and the TCC.
- The Special Master will rule on the parties’ objections as it deems appropriate, and will be authorized to enter tentative rulings compelling production, and to propose orders compelling such production for entry by this Court.
- If the Special Master overrules the Objecting Party’s objections, the Objecting Party shall produce to the TCC all responsive, non-privileged documents previously withheld on the basis of the objection at issue within 14 days.
- All documents produced by the vendors will be subject to this Court’s

END OF ORDER